

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DUBLINER, INC.,

Plaintiff,

V.

EAST COAST TAVERN GROUP, INC.
and INISHOWEN, INC.,

Defendants.

Case No. 1:23-cv-10567-RGS

JURY TRIAL DEMANDED

**DECLARATION OF MEGAN M. NEW IN SUPPORT OF
PLAINTIFF’S MOTION TO EXCLUDE CERTAIN OPINIONS OF DEFENDANTS’
DAMAGES EXPERT DOUG BANIA**

I am an attorney representing Plaintiff Dubliner, Inc. (“Plaintiff”) in this proceeding. I am over the age of eighteen (18) and make this declaration based on my personal knowledge. I am able to testify to the matters set forth herein if called to do so.

1. Attached hereto as **Exhibit A** is a true and accurate copy of the expert report of W. Todd Schoettelkotte.

2. Attached hereto as **Exhibit B** is a true and correct copy of the expert report of Dr. Lilly Jan.

3. Attached hereto as **Exhibit C** is a true and correct copy of the expert report of Doug Bania.

4. Attached hereto as **Exhibit D** is a true and correct copy of a screen capture of Dr. Lilly Jan's faculty page from Cornell University.

I hereby declare under the laws of the United States of America that the foregoing is true and correct.

Executed on this 7th day of April, 2025 in Chicago, Illinois.

By: /s/ Megan M. New
Megan M. New